

CR 18-00260

EJD

VKD

SEAL BY ORDER OF COURT

E-FILING

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA

vs.

NAHEED MANGI

JUN 14 2018

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

INDICTMENT

COUNT ONE: (18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), & (c)(4)(A)(i)(I) - Intentional Damage to a Protected Computer)

COUNT TWO: (18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), & (c)(4)(A)(i)(II) - Intentional Damage to a Protected Computer)

COUNT THREE: (18 U.S.C. § 1030(a)(2)(C) – Accessing a Protected Computer Without Authorization and Obtaining Information) (Class A Misdemeanor)

*A true bill.*

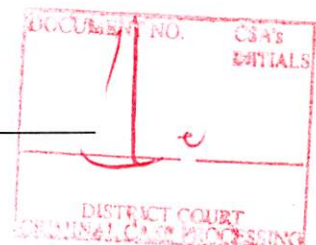
  
Foreperson

Filed in open court this 14<sup>th</sup> day of June  
A.D. 2018

  
United States Magistrate Judge

Bail. \$

No bail arrest  
warrant



E-FILED

ALEX G. TSE (CABN 152348)  
Acting United States Attorney

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NAHEED MANGI,

Defendant.

No.

) VIOLATIONS: 18 U.S.C. §§ 1030(a)(5)(A),  
) (c)(4)(B)(i), & (c)(4)(A)(i)(I) – Intentional Damage to  
) a Protected Computer; 18 U.S.C. §§ 1030(a)(5)(A),  
) (c)(4)(B)(i), & (c)(4)(A)(i)(II) – Intentional Damage  
) to a Protected Computer; 18 U.S.C. § 1030(a)(2)(C) –  
) Accessing a Protected Computer Without  
) Authorization and Obtaining Information (Class A  
) Misdemeanor)

) SAN JOSE VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), & (c)(4)(A)(i)(I) - Intentional Damage to a Protected Computer)

On or about August 19, 2013, in the Northern District of California and elsewhere, the defendant,

NAHEED MANGI,

knowingly caused the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused damage without authorization to protected computers of Cmed Technology, and caused loss to one or more persons during a one-year period affecting protected computers aggregating at least \$5,000 in value. Specifically, MANGI changed data, including

INDICTMENT

1 confidential health information, and added unauthorized comments into the clinical research database  
 2 for Patient Number 001 in the Stanford Cancer Institute's clinical study known as Velvet Breast Cancer  
 3 MO27782 Study.

4 In violation of Title 18, United States Code, Sections 1030(a)(5)(A), (c)(4)(B)(i), and  
 5 (c)(4)(A)(i)(I).

6 COUNT TWO: (18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), & (c)(4)(A)(i)(II) - Intentional Damage to a  
 7 Protected Computer)

8 On or about August 19, 2013, in the Northern District of California and elsewhere, the defendant,  
 9 NAHEED MANGI,  
 10 knowingly caused the transmission of a program, information, code, and command, and, as a result of  
 11 such conduct, intentionally caused damage without authorization to protected computers of Cmed  
 12 Technology, and caused the modification and impairment, and potential modification and impairment,  
 13 of the medical examination, diagnosis, treatment, and care, of one or more individuals. Specifically,  
 14 MANGI changed data, including confidential health information, and added unauthorized comments  
 15 into the clinical research database for Patient Number 001 in the Stanford Cancer Institute's clinical  
 16 study known as Velvet Breast Cancer MO27782 Study.

17 In violation of Title 18, United States Code, Sections 1030(a)(5)(A), (c)(4)(B)(i), and  
 18 (c)(4)(A)(i)(II).

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1 COUNT THREE: (18 U.S.C. § 1030(a)(2)(C) – Accessing a Protected Computer Without Authorization  
2 and Obtaining Information) (Class A Misdemeanor)

3 On or about August 19, 2013, in the Northern District of California and elsewhere, the defendant,  
4 NAHEED MANGI,  
5 intentionally accessed a protected computer without authorization, and thereby obtained information.  
6 Specifically, MANGI used the Internet to log into a clinical research database hosted by Cmed  
7 Technology in order to view medical records belonging to a patient participating in the Stanford Cancer  
8 Institute's clinical study known as the Velvet Breast Cancer MO27782 Study.

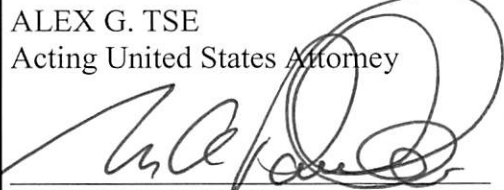
9 In violation of Title 18, United States Code, Section 1030(a)(2)(C).

10 DATED: 6-14-18

A TRUE BILL.

11   
12 FOREPERSON

13  
14 ALEX G. TSE  
15 Acting United States Attorney

16   
17 JOHN H. HEMANN  
18 Deputy Chief, Criminal Division

19 (Approved as to form: )  
20 AUSA SUSAN KNIGHT



## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING

## OFFENSE CHARGED

Count One: 18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), & (c)(4)(A)(i) ☐ Petty  
 (I) - Intentional Damage to a Protected Computer ☐ Minor  
 Count Two: 18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), & (c)(4)(A)(i) ☐ Misdemeanor  
 (II)  
 Count Three: 18 U.S.C. § 1030(a)(2)(C) - Accessing a Protected Computer Without Authorization and Obtaining Information (Class A Misdemeanor) ☒ Felony

PENALTY: Counts One and Two: 10 years' imprisonment, \$250K fine, 3 years of supervised release and \$100 special assessment  
 Count Three: One year imprisonment, \$100L fine, 1 year of supervised release, and \$25 special assessment.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

NAHEED MANGI

DISTRICT COURT NUMBER

CR 18 00260

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## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

United States Secret Service Special Agent Luis Correa

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Alex G. Tse (Acting USA)

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) Susan Knight

## IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

 1) ☒ If not detained give date any prior summons was served on above charges

 2) ☐ Is a Fugitive

 3) ☐ Is on Bail or Release from (show District)

## IS IN CUSTODY

 4) ☐ On this charge

 5) ☐ On another conviction

☐ Federal ☐ State

 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

## PROCESS:

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: